New-Indy Containerboard, LLC
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FED EX NO. 7758 0967 1348

July 25, 2019

Manager, Air Toxics Section
SCDHEC Bureau of Air Quality
2600 Bull Street
Columbia SC 29201-1708

Re: MACT Subpart S Excess Emissions and Monitoring System Performance Reports
New-Indy Catawba LLC – Catawba, South Carolina, Permit No. TV-2440-0005

Manager, Air Toxics Section:

The purpose of this submittal is to meet the semi-annual reporting requirements applicable to New-Indy Catawba LLC associated with the National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry (40 CFR 63, Subpart S). This submittal meets the requirements for both the Periodic Startup, Shutdown, and Malfunction (SSM) reporting under 63.455(g) and Excess emissions and continuous monitoring system performance report and summary report under 63.10(e)(3) pursuant to Sections 63.10(d)(5)(i) and 63.10(e)(3).

The summary reports are attached as allowed in Section 63.10(e)(3)(vii). For SSM purposes, consistent with 63.455(g), when an excess emission has occurred, specific information about the type, and duration, and corrective action is reported on the enclosed log(s).

Actions taken during excess emission SSM events, including corrective actions, were consistent with the facility procedures specified in the SSM Plan for this facility.

Based on information and belief formed after reasonable inquiry, I certify to the best of my knowledge, that the statements and information in this submission are true, accurate, and complete.

If you have any questions or require additional information, please contact Mike Swanson at (803) 981-8010 or mike.swanson@new-indycb.com

Sincerely,

Charles Cleveland
Technical Services Manager

Attachments: MACT I Logs

cc: EPA Region 4
SCDHEC – BAQ, Technical Management Section
Alex Latta, Midlands EQC Lancaster
Environmental File 231.18

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Chlorine
Time Period:	3-Hour Average
Reporting Period:	January 1, 2019 through June 30, 2019
Process Unit Description:	Bleach Plant Scrubber System
Company:	New-Indy Catawba LLC
Emission Limits:	Scrubber Outlet Conc. <10 ppmv Cl_2 (40 CFR 63.445 (c)(2))
Operating Parameters:	Scrubber liquid influent (recirculation) flow > 87 gpm Scrubber effluent pH > 10.4 Scrubber fan operational status - ON
Monitor Manufacturer(s) and Model Number(s):	Liquid flow / Rosemount 8712 CR12M4C1NO pH / TBI TBX557-J1E11f20JB
Last CMS Certification or Audit Date:	Flow Meter Audit (Calibration): 5/7/2018 pH (Calibration): 11/16/2018
Total Source Operating Time in Reporting Period:	3,887 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Excess Emissions / Process Operating Time	0.00 %

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Causes	0 Hour
Other Unknown Causes	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	0.00 %

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Charles Cleveland Technical Services Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	15-day rolling average
Reporting Period:	January 1, 2019 through June 30, 2019
Process Unit Description:	Condensate Collection and Treatment System
Company:	New-Indy Catawba LLC
Emission Limits:	Collect 11.1 lbs. Methanol/ODTUBP (40 CFR 63.446 (c)(3)) Treat (remove) 10.2 lbs. Methanol/ODTUBP (40 CFR 63.446 (e)(5))
Operating Parameters:	Condensate Feed Rate, Condensate Feed Temperature, Steam Flow Effective Steam Ratio (condensate feed rate / (steam flow to column less steam for condensate preheat) > 16 = 92%
Monitor Manufacturer(s) and Model Number(s):	Condensate Flow – Rosemount /3051CD2A22A1JB4L4M6T1F6 Steam Flow - Rosemount /3051CD2A22A1JB4L4M6T1E5 Condensate Temperature – Rosemount/3144D5E5B4T1M5
Last CMS Certification or Audit Date:	Condensate Flow (calibration): 5/15/2018 Steam Flow (calibration): 5/15/2018 Condensate Temperature (calibration): 5/15/2018
Total Source Operating Time in Reporting Period:	4,068 hours

EMISSION DATA SUMMARY

Reason for Excess Emissions	Duration
A. Startup/Shutdown	0 Hour
B. Malfunctions	0 Hour
Process/Instrument System	0 Hour
Control/Operating/Collection	0 Hour
Other Known Cause	168 Hour
Other Unknown Cause	0 Hours
Total Number of Incidents	1
Excess Emissions / Process Operating Time	4.13%

CMS PERFORMANCE SUMMARY

Reason for Monitor Downtime	Duration
Monitor Equipment Malfunctions	0 Hour
Non-Monitor Equipment Malfunctions	0 Hour
Quality Assurance/Quality Assurance Calibrations	0 Hour
Other Known Cause	0 Hour
Other Unknown Cause	0 Hour
Total Number of Incidents	0
Percent Monitor Downtime	NA

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.
Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Charles Cleveland Technical Services Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	Hours
Reporting Period:	January 1, 2019 through June 30, 2019
Process Unit Description:	LVHC System – Combination Boilers
Company:	New-Indy Catawba LLC
Emission Limits:	Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 1%.
Operating Parameters:	N/A
Monitor Manufacturer(s) and Model Number(s):	N/A
Last CMS Certification or Audit Date:	N/A
Total Source Operating Time in Reporting Period:	4,068 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	**Duration**
	A. Startup/Shutdown	1.28 Hours
Note: Specific incidents are shown on the attached log for.	B. Malfunctions	
	Process/Instrument System	0.13 Hours
	Control/Operating/Collection	0 Hours
	Other Known Cause	9.87 Hours
	Other Unknown Cause	0.28 Hours
	Total Number of Incidents	19
	Excess Emissions / Process Operating Time	0.28 %

CMS PERFORMANCE SUMMARY

A CMS is not required when LVHC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Charles Cleveland Technical Services Manager

Signature: _____

SUMMARY REPORT

GASEOUS AND OPACITY EXCESS EMISSION AND CONTINUOUS MONITORING SYSTEM PERFORMANCE

HAP(s) Monitored:	Methanol
Time Period:	Hours
Reporting Period:	January 1, 2019 through June 30, 2019
Process Unit Description:	HVLC System – Combination Boilers
Company:	New-Indy Catawba LLC
Emission Limits:	Reduce total HAP emission using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Total excess emission less than 4%.
Operating Parameters:	N/A
Monitor Manufacturer(s) and Model Number(s):	N/A
Last CMS Certification or Audit Date:	N/A
Total Source Operating Time in Reporting Period:	4,068 hours

EMISSION DATA SUMMARY

	Reason for Excess Emissions	**Duration**
	A. Startup/Shutdown	0.12 Hour
Note: Specific incidents are shown on the attached log for.	B. Malfunctions	
	Process/Instrument System	0.68 Hours
	Control/Operating/Collection	0.0 Hours
	Other Known Cause	0.58 Hours
	Other Unknown Cause	0.0 Hour
	Total Number of Incidents	7
	Excess Emissions / Process Operating Time	0.03%

CMS PERFORMANCE SUMMARY

A CMS is not required when HVLC gases are incinerated in a combination boiler.

There were no changes in the continuous monitoring systems, processes, or control devices since the last reporting period.

Based on data provided, reasonable inquiry, and the best of my abilities, I certify that the information contained in this report is accurate and complete.

Name/Title: Charles Cleveland Technical Services Manager

Signature: _____